

MB

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FREE SPEECH COALITION, INC. et al.,

Plaintiffs,

v.

THE HONORABLE ERIC H. HOLDER, JR.,  
Attorney General,

Defendant.

) Civil Action No. 2:09-4607 File

) Judge Michael M. Baylson

) STIPULATION TO STAY DISCOVERY

) WITH RESPECT TO PLAINTIFFS'

) FOURTH AMENDMENT CLAIMS

FILED

SEP 10 2012

MICHAEL E. KUNZ, Clerk  
By [Signature] Dep. Clerk

The parties, through undersigned counsel, hereby agree and stipulate that all discovery obligations, including initial disclosure obligations, with respect to plaintiffs' Fourth Amendment claims shall be stayed pending this Court's ruling on defendant's Motion to Dismiss those claims. *See* ECF No. 92. Should the Court subsequently deny defendant's Motion to Dismiss in Part, the parties shall file a supplemental proposed discovery schedule, setting forth separate proposed discovery deadlines with respect to plaintiffs' Fourth Amendment claims, within thirty days of the Court's Order.

August 28, 2012

Respectfully submitted,

/s/

J. Michael Murray

jmmurray@bgmdlaw.com

Lorraine R. Baumgardner

lbaumgardner@bgmdlaw.com

Berkman, Gordon, Murray &amp; DeVan

55 Public Square Ste. 2200

Cleveland, Ohio 44113

Tel. (216) 781-5245 / Fax (216) 781-8207

Kevin E. Raphael

KER@Pietragallo.com


J. Peter Shindel, Jr.

JPS@Pietragallo.com  
Pietrogallo Gordon Alfano Bosick  
& Raspanti, LLP  
1818 Market Street, Suite 3402  
Philadelphia, Pennsylvania 19103  
Tel. (215) 320-6200/ Fax (215) 981-0082  
*Attorneys for Plaintiffs*

STUART F. DELERY  
Acting Assistant Attorney General  
ZANE DAVID MEMEGER  
United States Attorney  
VINCENT M. GARVEY  
Deputy Branch Director

/s/ Kathryn L. Wyer  
KATHRYN L. WYER  
U.S. Department of Justice, Civil Division  
20 Massachusetts Avenue, N.W.  
Washington, DC 20530  
Tel. (202) 616-8475 / Fax (202) 616-8470  
kathryn.wyer@usdoj.gov  
*Attorneys for Defendant*

APPROVED BY:

  
\_\_\_\_\_  
HON. MICHAEL M. BAYLSON  
9/10/12

ENTERED

SEP 10 2012

CLERK OF COURT